

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: James J. Fannon, Jr.
Kimberly S. Fannon, Jr.
Debtors

CHAPTER 13

CASE NO. 10-30012 SR

**OBJECTION OF OCWEN LOAN SERVICING, LLC AS SERVICER FOR U.S. BANK,
N.A. AS TRUSTEE FOR THE REGISTERED HOLDERS OF STRUCTURED ASSET
SECURITIES CORPORATION MORTGAGE PASS-THROUGH CERTIFICATES,
SERIES 2007-TC1 TO DEBTORS' CHAPTER 13 PLAN**

AND NOW COMES, Ocwen Loan Servicing, LLC as servicer for U.S. Bank, N.A. as Trustee for the Registered Holders of Structured Asset Securities Corporation Mortgage Pass-Through Certificates, Series 2007-TC1 ("Mortgagee"), secured creditor and mortgage lien holder on premises owned by Debtor and located at 2410 Lindsay St., Chester, PA 19013, by its attorneys, Udren Law Offices, P.C., who hereby avers as follows:

1. Mortgagee is a secured creditor by way of a mortgage representing a lien on Debtor's real property as set forth above.
2. Debtors filed the instant Chapter 13 Bankruptcy Petition on 11/17/2010.
3. Mortgagee filed a Proof of Claim on or about 12/16/10.
4. As of the date of the filing of the instant Chapter 13 petition, the Debtor had mortgage arrears of \$13,409.70.
5. Debtors' Chapter 13 Plan provides for payment of mortgage arrears of only \$0.
6. The Chapter 13 Plan does not provide for the Mortgagee to receive distributions with a value equal to the allowed amount of its claim as required by 11 U.S.C. 1325(a)(5)(B)(ii).

Wherefore, Ocwen Loan Servicing, LLC as servicer for U.S. Bank, N.A. as Trustee for the Registered Holders of Structured Asset Securities Corporation Mortgage Pass-Through Certificates, Series 2007-TC1 prays and respectfully requests that the Debtor be required to file an Amended Chapter 13 Plan providing for full payment of arrears due Mortgagee as outlined in the Proof of Claim filed of record.

By: /s/ Marguerite L. Thomas

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